

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2020-125-E

IN RE:)	Dominion Energy South Carolina,
Application of Dominion Energy South)	Inc.'s Second Set of Discovery Requests
Carolina, Incorporated for Adjustment of)	to the Office of Regulatory Staff
Rates and Charges)	
_____)	

Pursuant to South Carolina Regulation 103-833, Dominion Energy of South Carolina, Inc. ("DESC") respectfully submits its Second Set of Written Interrogatories and Requests for Production of Documents and Things to the Office of Regulatory Staff.

Instructions

1. Responses should be provided within 20 days in writing and under oath, as specified in Regulation 103-833.
2. These requests are continuing in nature and require you to supplement or amend your answer in a timely manner if you learn that the answer is incorrect or incomplete or if you identify additional documents or information responsive to the request.
3. Where knowledge, information, or documents are requested, such request encompasses knowledge, information, or documents in your possession, custody, or control, or in the possession, custody, or control of your staff, agents, employees, representatives, expert witnesses and consultants, and, unless privileged, attorneys.

4. If you object to a portion of any request, state the grounds of your objection with specificity and answer the remainder of the request. Objections on account of vagueness should specifically explain why you believe the request is vague and should state your understanding of the information being sought along with a response consistent with your understanding.

5. For every page produced to DESC that contains confidential information, the page is to be marked “CONFIDENTIAL” in the header. Any specific information which you designate as confidential information must also be marked by notation, highlighting, or other conspicuous means.

6. “Party” is defined as the Office of Regulatory Staff.

Document and Information Requests

DESC 1-12. Please provide copies of all source documents, articles, regulatory decisions, work papers, and other sources supporting the contention that a transmission line’s capacity is a relevant consideration in planning or determining the need or utility of transmission assets.

DESC 1-13. Please provide copies of all reports, studies, analyses, regulatory decisions or other data in which a proposed transmission line’s low anticipated capacity factor was cited as a relevant planning criterion.

DESC 1-14. Please provide copies of all reports, studies, analyses, regulatory decisions or other data either in which a proposed transmission line’s low anticipated capacity factor was cited as a reason for not constructing that transmission line or find it not to be useful.

DESC 1-15. Please provide copies of all source documents, articles, regulatory decisions, work papers, and other sources that support the contention that a transmission asset's capacity factor is a relevant indicator of its value to system reliability.

Respectfully submitted,

_____/s/ Belton T. Zeigler_____
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December 15, 2020
 Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2020-125-E

IN RE:)	
Application of Dominion Energy South)	
Carolina, Incorporated for Adjustment of)	CERTIFICATE OF SERVICE
Rates and Charges)	

This is to certify that I have this date caused to be served one (1) copy of **Dominion Energy South Carolina Inc.’s Second Discovery Requests to the Office of Regulatory Staff** on behalf of Dominion Energy South Carolina, Inc. in the above-referenced matter upon the persons named below via electronic mail:

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December 15, 2020
Columbia, South Carolina

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____s/Kathryn S. Mansfield_____